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The Honorable Frederick P. Corbit  
Chapter: 7

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In Re:

GIGA WATT, INC., a Washington  
corporation,

Debtor.

MARK D. WALDRON, as Chapter 7  
Trustee,

Plaintiff,

vs.

PERKINS COIE, LLP, a Washington  
limited liability partnership; LOWELL  
NESS, individual and California resident;  
GIGA WATT PTE., LTD. a Singapore  
corporation; and ANDREY KUZENNY, a  
citizen of the Russian Federation;

Defendants

and

THE GIGA WATT PROJECT, a  
partnership,

Nominal defendant.

No. 18-03197-FPC11

The Honorable Frederick P. Corbit

**CHAPTER 7**

Adv. Case No. 20-80031

**STIPULATED AMENDMENT  
TO SCHEDULING ORDER**

STIPULATED AMENDMENT TO SCHEDULING  
ORDER - 1

BYRNES ♦ KELLER ♦ CROMWELL LLP  
38TH FLOOR  
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SEATTLE, WASHINGTON 98104  
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1 For the reasons explained in status conferences held on April 21, 2022, and  
2 May 10, 2022, and after consultation with the Court's Deputy Clerk, Jolene Britton,  
3 regarding the Court's availability for trial, the parties hereby stipulate that the existing  
4 Scheduling Order (ECF 80) may be amended as follows.  
5

6 IT IS HEREBY ORDERED that the trial scheduling dates are continued as  
7 follows:  
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- 9 1. Last day to move to amend pleadings or join additional parties, August 1,  
10 2022;
- 11 2. All fact discovery completed, August 31, 2022;
- 12 3. Opening expert reports per FRCP 26(a)(2), September 26, 2022;
- 13 4. Rebuttal expert reports, October 17, 2022;
- 14 5. Completion of expert depositions, November 7, 2022;
- 15 6. Last day to file dispositive motions, December 1, 2022;
- 16 7. Exchange initial exhibit and witness lists, January 16, 2023;
- 17 8. Plaintiff's trial brief filed and served, February 6, 2023;
- 18 9. Defendants' trial brief filed and served, February 20, 2023;
- 19 10. Plaintiff's initial deposition designations, February 20, 2023;
- 20 11. Plaintiff's reply to Defendants' trial brief, February 27, 2023;
- 21 12. Defendants' initial and counter deposition designations, March 1, 2023;
- 22 13. Pretrial Order filed by 12:00 p.m., March 3, 2023;
- 23 14. Pretrial Conference, March 7, 2023, at 1:30 .p.m.;
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15. Final exhibit and witness lists, March 7, 2023, with counsel to file their exhibits as attachments to the exhibit index and to redact private information;
16. Motions in Limine, March 7, 2023;
17. Plaintiff's deposition counter designations, March 10, 2023;
18. Oppositions to Motions in Limine, March 14, 2023;
19. Highlighted depositions to Court, March 17, 2023;
20. Replies in Support of Motions in Limine, March 17, 2023; and
21. Trial on March 21, 2023, at 9:00 a.m.

1 DATED this 25th day of May, 2022.

2 Presented By:

3 BYRNES KELLER CROMWELL LLP

POTOMAC LAW GROUP PLLC

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By /s/ Pamela M. Egan

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STIPULATED AMENDMENT TO SCHEDULING  
ORDER - 4

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